

EXHIBIT B

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WRITER'S DIRECT LINE

December 11, 2009

VIA HAND DELIVERY

The Honorable James M. Peck
United States Bankruptcy Court for the
Southern District of New York
One Bowling Green
New York, NY 10004

Re: *In re Lehman Brothers Holdings Inc., et al.*
Case No. 08-13555 (JMP)

*Motion Pursuant to Sections 105(a), 362 And 365 of the Bankruptcy Code to
Compel Performance of Capital Automotive L.P.'s Obligations Under an
Executory Contract and to Enforce the Automatic Stay [Docket No. 5650] (the
"Motion to Compel")*

Dear Judge Peck:

We represent Lehman Brothers Special Financing Inc. ("LBSF," together with its affiliated chapter 11 debtors, the "Debtors") and write to request a chambers conference with respect to the Motion to Compel and the Objection of Capital Automotive L.P. ("Capital Auto") to Debtor Lehman Brothers Special Financing, Inc.'s Motion, Pursuant to Sections 105(a), 362 and 365 of the Bankruptcy Code, to Compel Performance of Obligations Under an Interest Rate Swap Agreement [Docket Number 5931] (the "Objection").

We believe that the Objection seeks to improperly introduce into evidence testimony and other communications concerning settlement negotiations between the parties in violation of a Negotiation Agreement entered into by the parties on December 5, 2008. Accordingly, we are prepared to file a motion to strike the Objection and request a chambers or telephonic conference to discuss scheduling of such a motion. We believe the motion to strike presents threshold issues that should be resolved before the merits of the Motion to Compel are considered, and we will be adjourning the December 16, 2009 hearing set on the Motion to Compel to the next omnibus hearing on January 13, 2010. We request that the forthcoming

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motion to strike be set for hearing at the December 16, 2009 omnibus hearing, or as soon as possible thereafter.

Prior to the submission of this letter, we requested that Capital Auto voluntarily withdraw the Objection subject to an opportunity to re-file an objection that does not contain or reference inadmissible evidence of settlement negotiations that are subject to the contractual restrictions agreed to by the parties. Capital Auto refused this request.

We respectfully request a chambers or telephonic conference to discuss the above at the Court's earliest convenience.

Respectfully submitted,

/s/ Richard W. Slack

Richard W. Slack

cc: Raymond L. Shapiro (by email)
Andrew B. Eckstein (by email)
Thomas E. Biron (by email)
Jeremy A. Rist (by email)
Robert Lemons

Biron, Thomas

From: Velevis, Rob S. [robert.velevis@weil.com]
Sent: Friday, December 11, 2009 4:44 PM
To: Shapiro, Ray; Eckstein, Andrew; Biron, Thomas; Rist, Jeremy
Cc: Slack, Richard; Lemons, Robert; Singh, Sunny
Subject: Lehman/Capital Auto
Attachments: Letter to Court.pdf

Please see the attached letter that was delivered to the court this afternoon.

Robert Velevis
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1/5/2010